

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

463 KING STREET, SUITE B
CHARLESTON, SC 29403-7204

Facsimile 843-414-7039

August 28, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish
Duke Energy Progress, LLC's Standard Offer, Avoided Cost Methodologies,
Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any
Other Terms or Conditions Necessary (Includes Small Power Producers as
Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-
41-20(A)
Docket Number 2019-186-E

Dear Ms. Boyd:

Please find attached for electronic filing the *Motion for Admission Pro Hac Vice* and
Verified Application of Maia Danaid Hutt on behalf of the South Carolina Coastal Conservation
League (CCL) and Southern Alliance for Clean Energy (SACE) in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stinson W. Ferguson
Stinson W. Ferguson
Southern Environmental Law Center
463 King St., Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

*Attorney for South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

Enclosures
CC (w/encl.): Parties of Record

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-186-E

In re: South Carolina Energy Freedom Act)
(H.3659) Proceeding to Establish Duke)
Energy Progress, LLC's Standard Offer,)
Avoided Cost Methodologies, Form)
Contract Power Purchase Agreements,)
Commitment to Sell Forms, and Any Other)
Terms or Conditions Necessary (Includes)
Small Power Producers as Defined in 16)
United States Code 796, as Amended) -)
S.C. Code Ann. Section 58-41-20(A))

MOTION FOR ADMISSION
PRO HAC VICE

Intervenors South Carolina Coastal Conservation League (“CCL”), and Southern Alliance for Clean Energy (“SACE”) hereby move the Public Service Commission of South Carolina (“Commission”) to permit Maia Danaid Hutt to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Hutt, with the consent of counsel of record, has submitted to the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, CCL and SACE respectfully request that this motion be granted.

This 28 day of August, 2019.

/s/ Stinson W. Ferguson
Stinson W. Ferguson
SC Bar No. 79871
Southern Environmental Law Center
463 King St., Suite B
Charleston, SC 29403

Telephone: (843) 720-5270

Fax: (843) 414-7039

sferguson@selcsc.org

*Attorney for South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-186-E

In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Progress, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A))))))))))))))))	CERTIFICATE OF SERVICE
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I certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Application by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Alexander W. Knowles, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
aknowles@ors.sc.gov

Jeremy C. Hodges, Counsel
Nelson Mullins Riley & Scarborough, LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
jeremy.hodges@nelsonmullins.com

Andrew M. Bateman, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
abateman@ors.sc.gov

Nanette S. Edwards, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
nedwards@ors.sc.gov

Becky Dover, Counsel
SC Department of Consumer Affairs
bdover@scconsumer.gov

Rebecca J. Dulin, Counsel
Duke Energy Carolinas, LLC
1201 Main Street, Suite 1180
Columbia, SC 29201
Rebecca.Dulin@duke-energy.com

Carri Grube - Lybarker, Counsel
SC Department of Consumer Affairs
clybarker@scconsumer.gov

Richard L. Whitt, Counsel
Whitt Law Firm, LLC
Post Office Box 362
Irmo, SC 29063
richard@rlwhitt.law

Carrie Harris Grundmann, Counsel
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
cgrundmann@spilmanlaw.com

Derrick Price Williamson, Counsel
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

E. Brett Breitschwerdt, Counsel
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
Raleigh, NC 27601
bbreitschwerdt@mcguirewoods.com

Frank R. Ellerbe, III, Counsel
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, SC 29201
fellerbe@robinsongray.com

Heather Shirley Smith, Deputy General Counsel
Duke Energy Carolinas, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
heather.smith@duke-energy.com

James Goldin, Counsel
Nelson Mullins Riley & Scarborough
LLP
1320 Main Street 17th Floor
Columbia, SC 29210
jamey.goldin@nelsonmullins.com

Robert R. Smith, II, Counsel
Moore & Van Allen, PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202
robsmith@mvalaw.com

Samuel J. Wellborn, Counsel
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, SC 29201
swellborn@robinsongray.com

Scott Elliott, Counsel
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, SC 29201
selliott@elliottlaw.us

Stephanie U. (Roberts) Eaton, Counsel
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com

Weston Adams III, Counsel
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 11070
Columbia, SC 29211
weston.adams@nelsonmullins.com

This the 28 day of August, 2019.

s/ Stinson W. Ferguson
Stinson W. Ferguson
Southern Environmental Law Center

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

In the Matter of:

South Carolina Energy Freedom Act
(H.3659) Proceeding to Establish
Duke Energy Progress, LLC's
Standard Offer, Avoided Cost
Methodologies, Form Contract
Power Purchase Agreements,
Commitment to Sell Forms, and
Any Other Terms or Conditions
Necessary (Includes Small Power
Producers as Defined in 16 United
States Code 796, as Amended) -
S.C. Code Ann. Section 58-41-
20(A)

Docket No. 2019-186-E

Public Service Commission of
South Carolina

Plaintiff	Case No.	Tribunal
vs.	Mailing Address of Tribunal:	101 Executive Center Drive, Suite 100 Columbia, SC 29210
Defendant		

Comes now Maia Danaid Hutt, applicant herein, and respectfully represents the following:

1. Applicant resides at:

Street Address

City County State Zip Code

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern Environmental Law Center, with offices at:

601 W. Rosemary Street, Suite 220

Street Address

Chapel Hill Orange NC 27516
City County State Zip Code

919-967-1450 919-929-4921 mhutt@selcnc.org
Primary Telephone Cell Phone Fax Number Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by South Carolina Coastal Conservation League and Southern Alliance for Clean Energy to provide legal representation in

connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since October of 2018, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
North Carolina State Courts	October 12, 2018
U.S. District Court for the Eastern District of North Carolina	May 9, 2019

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Stinson W. Ferguson of the Southern Environmental Law Center law firm, which has offices at:

<u>463 King Street, Suite B</u>			
Street Address			
<u>Charleston</u>	<u>Charleston</u>	<u>South Carolina</u>	<u>29403</u>
City	County	State	Zip Code
<u>843-720-5270</u>		<u>843-414-7039</u>	<u>sferguson@selcsc.org</u>
Primary Telephone	Cell Phone	Fax Number	Email Address

79871

South Carolina Bar Number

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

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11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 28 day of August, 20 19



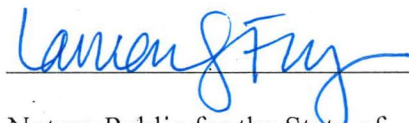
APPLICANT

VERIFICATIONSTATE OF North Carolina)COUNTY OF Orange)

I, Maia Danaid Hutt, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.



APPLICANT/AFFIANT

Subscribed and sworn to before me this 28 day of August, 20 19

Notary Public for the State of North CarolinaMy Commission Expires: 03/25/2023**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 28 day of August, 20 19

Stinson W. Ferguson, with express permission
LOCAL COUNSEL OF RECORD by Lauren Fry

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

28 day of August, 20 19



APPLICANT/AFFIANT

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on October 12, 2018, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

MAIA DANAID HUTT

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this August 7, 2019.

A handwritten signature in cursive script that reads "Amy L. Funderburk".

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina

